



# **Clean Air Act Compliance Inspection Report**

United States Environmental Protection Agency  
Region 10 – Seattle, WA

## ***Clean Air Act Full Compliance Evaluation Inspection Report***

**Caliber Collision Center - Twin Falls West 0266**  
**Twin Falls, ID 83301**

**Inspection Date: July 19, 2022**

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Report Author Signature

Date

Bryan Lange  
U.S. Environmental Protection Agency, Contract Inspector  
Eastern Research Group

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Peer Review Signature

Date

Elly Walters  
CAA/TRI Enforcement Officer  
EPA Region 10

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Section Chief Signature

Date

Derrick Terada  
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EPA Region 10

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### Attachments

Attachment 1 .....	Idaho Air Quality Compliance Inspection, Preliminary Inspection Findings
Attachment 2 .....	Air Filtration Co., Inc. – Model: L111-560
Attachment 3 .....	viledon® – Fiberglass Paint Arrestors – 300, 400, and 500 Series
Attachment 4.....	EPA Region 10 Digital Image Log

## 1. Basic Facility and Inspection Information

Facility: Caliber Collision Center - Twin Falls West 0266  
419 4th Avenue West  
Twin Falls, ID 83301

Mailing Address: Caliber Collision Center - Twin Falls West 0266  
404 4th Avenue West  
Twin Falls, ID 83301

AFS/FRS Number: Not available

State Facility ID: 083-00132

SIC: 7532 Top, Body, and Upholstery Repair Shops and Paint Shops

NAICS: 811121 Automotive Body, Paint, Interior Repair and Maintenance

Permit Number: Idaho Permit to Construct No. P-2011.005, dated October 28, 2020

Facility Contacts: Edward Dyer  
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Caliber Collision Center  
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Date of Inspection: July 19, 2022

Inspection Start/End Times: July 19, 2022, 12:40 pm – 1:40 pm MST

Inspection Notice: This was an announced inspection.

Ms. Orr notified Mr. Dyer, by phone and email on July 18, 2022.

This was a Clean Air Act (CAA) compliance inspection by an Environmental Protection Agency (EPA) contractor. Inspector Mr. Lange, with Eastern Research Group, led the inspection. The state air agency was made aware of the inspection beforehand and participated in the inspection. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if the facility is in compliance with the Permit to Construct (PTC) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources).

## **Disclaimer**

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

### **1. Facility/Process Description:**

The following facility description is based on information provided by a facility representative in the opening conference as well as information found on-file regarding permits and prior inspections.

Caliber Collision Center is a refinishing operation that repairs and paints automobiles. It has two paint booths. The facility does not paint complete cars, but repairs panels damaged in a collision. The emission sources located at the facility included the following:

- Mixing room,
- Spray booths,
- Spray guns,
- Spray gun cleaning equipment,
- Paint storage area, and
- Spray booth heater.

### **2. Compliance History**

January 24, 2018, Idaho Department of Environmental Quality (DEQ) conducted an on-site inspection and the facility was found in compliance at the time of the inspection.

Caliber Collision Center is not registered in EPA's ECHO as of the date of this report.<sup>1</sup>

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<sup>1</sup> See <https://echo.epa.gov/>

### **3. Records Review Prior To The Inspection**

Prior to inspection, Idaho DEQ shared copies of these items and each was reviewed:

- October 28, 2020 - Project file memorandum dated documenting a transfer of ownership Snake River Auto Body and Paint Inc. to Caliber Collision Center – Twin Falls West 0266.
- October 28, 2020 - PTC No. P-2011.0057.
- January 24, 2018 - Idaho inspection report documenting an on-site inspection.
- February 18, 2011 - PTC No. P-2011.0057 statement of basis.

#### **a. Entry and Opening Conference**

Mr. Lange and Ms. Orr (“the inspectors”) arrived at the facility at approximately 12:40 pm MST on July 19, 2022. They entered the customer lobby and met with Edward Dyer. The inspectors presented identification cards and explained that they were at the facility to conduct a CAA permit inspection. The opening conference included a discussion of ownership and operations.

Mr. Dyer explained that in 2020, ownership of the autobody shop was transferred from Snake River Auto Body and Paint Inc. to Caliber Collision Center. Mr. Dyer also explained that since 2020, there had been no history odor complaints and that each spray booth has its own heater that only fires natural gas.

The inspectors explained that the inspection would consist first, of a review of the PTC conditions and second a walk-through where records related to permit exemption will be reviewed.

The inspectors also explained that following the walk-through, Idaho DEQ will leave the facility with a carbon copy of an Air Quality Compliance Inspection - Preliminary Inspection Findings Form (PIFF) documenting the inspection details and Ms. Orr will keep the original.

### **4. Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (NESHAP Subpart 6H)**

The January 2018 Idaho inspection report indicated that “Snake River Auto Body and Paint Inc.” submitted a NESHAP Subpart 6H petition for exemption in February of 2018. Mr. Dyer was not in possession of either a copy of the Snake River petition for exemption submitted to EPA or a letter from EPA documenting the receipt and approval of the 6H exemption.

Mr. Dyer indicated that the coating materials used on-site does not contain the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) and rule does not apply. Nonetheless, Caliber Collision Center follows the general compliance requirements of the NESHAP. Specifically, Mr. Dyer was able to demonstrate that all painters were trained in the proper application of surface coatings. All training records were accessible through a software package EnviroSAFE. High volume-low pressure (HVLP) paint guns are used for all applications of coatings.

## 5. Permit to Construct Conditions

To determine if the facility is in compliance with the VOC and PM<sub>10</sub> emission limits included in the Permit to Construct (PTC) the inspectors reviewed paint consumption records and discussed spray booth filter system maintenance procedures.

Compliance with VOC emission limits are demonstrated with the coating material use limit. Specifically, the use rates shall not exceed 4.0 gallons per day for all coating materials. Caliber Collision Center coating material usage is recorded EnviroSafe. Mr. Dyer provided paint consumption totals for three random dates chosen by the inspectors. Mr. Dyer also commented that the Caliber Collision Center uses water-based paints which, compared to solvent based, are low in VOC content.

	7/13/2022	6/15/2022	5/4/2022
Total daily paint consumption (gallons)	1.5	1.72	2.24

Mr. Dyer explained that ceiling and floor filters come from different manufacturers. The ceiling filters are from Air Filtration Co., Inc.; they are changed on an annual basis by K & K Enterprises. The exhaust or floor filters are from Viledon. The floor filters are changed once or twice per month depending on paint booth use. Consistent flow is necessary for a quality finish on the automobiles.

## 6. Facility Walk-Through and On-Site Records Review

At approximately 1:00 pm MST, the inspectors were escorted to the automobile paint and repair area by Mr. Dyer which was across the street from the customer and administrative building.

The inspectors observed the two semi-downdraft paint booths. Photographs 1 through 4 in attached photo log are of the first paint booth which was empty. Visible in photographs 3 and 4 are the exhaust and intake air filters, respectively. A vehicle was inside the second paint booth during the inspection, but inspectors did not observe painting. See photographs 5 through 7.

Paint booth filter change-outs and routine maintenance were documented on paper and in permanent marker on the booth exterior. See photographs 8 and 9.

The inspectors observed dozens of paints in the mixing area. See photographs 10 through 12.

The inspectors observed that each paint gun used for the applications of coatings was HVLP. See photographs 13 through 15.

Ms. Orr selected a paint at random (i.e., DC5335 Glamour Clear) and Mr. Dyer produced the SDS sheet. Neither silicon dioxide nor the Subpart HHHHHH target HAP (i.e., compounds of chromium, lead, manganese, nickel, or cadmium) were present in a measurable quantity. See photographs 16 through 18.

Mr. Dyer indicated the total heat input capacity of the paint booth and space heaters was less than 10 MMBtu/hr heater. Visible in photograph 19 is the space heater.

The walk-through ended at approximately 1:30 pm MST.

## **7. Closing Conference**

At approximately 1:30 pm MST, the inspectors held a closing conference. Mr. Lange led the closing conference and summarized the exemption permit conditions and records observed by the inspectors. Mr. Lange went through his inspection notes and explained that there were no areas of concern from the inspection.

Ms. Orr explained that as a new owner it may be appropriate to resubmit the NESHAP Subpart 6H petition for exemption.

Ms. Orr presented Mr. Nelson with carbon copy of an Idaho DEQ Air Quality Compliance Inspection PIFF documenting inspection details and preliminary status of in-compliance at the time of the inspection. See attachment 1.

The inspectors departed the facility at 1:40 pm MST.

Mr. Dyer was asked to collect and deliver removal efficiency details from each filter manufacture. On July 19, 2022, at 2:16 pm MST sent the requested manufacture details by email. Filter performance details document compliance with the minimum control efficiency of 98% for PM<sub>10</sub> emissions; attachment 2 shows the performance of the Air Filtration ceiling filter; attachment 3 shows the performance of the viledon (fiberglass) exhaust, floor filter.